IN THE UNITED STATES COURT OF FEDERAL CLAIMS BID PROTEST

FMS Investment Corp.,)	19-308 C
Plaintiff,)	Case No. XX-XXX
)	
v.)	Judge:
THE LINETED OF A TEC)	
THE UNITED STATES,)	
Defendant.)	
)	
)	

NOTICE OF RELATED CASES

Pursuant to RCFC 40.2, Plaintiff FMS Investment Corp. ("FMS") states that the following cases previously pending before this Court are related to the instant action:

• Navient Solutions, LLC et al. v. United States, No. 18-cv-01679 et al.

This bid protest is the most recent in a series of protests relating to the Department of Education's attempts to procure defaulted student loan collection services. Instead of accepting supplemental complaints in the above-listed bid protests, Judge Wheeler dismissed the above-listed protests without prejudice, stating:

Because the parties' allegations concern ED's new solicitation, the Court orders Continental, FMS, and other plaintiffs to Case No. 18-1679 who wish to contest ED's revised solicitation, to file their new complaints separately. The Court will open a fresh docket to address the parties' new protests. The Clerk of Court is directed to waive the filing fees for parties to Case No. 18-1679 who wish to

file new complaints related to ED's revised solicitation. The parties

should call the Clerk's office before filing. The cases consolidated

under Case No. 18-1679 are hereby dismissed without prejudice.

Navient Solutions, LLC et al. v. United States, No. 18-cv-01679 et al., Dkt. No. 81. This

Complaint contains FMS's protest challenges to the revised Department of Education

solicitations.

The above cases were assigned to Judge Wheeler, who similarly has handled related

litigation involving ED and its attempts to procure default collection services. FMS believes

assigning the instant action to Judge Wheeler will conserve judicial resources and promote the

efficient administration of justice.

Dated: February 27, 2019

FMS also understands that several additional parties may be filing bid protests

challenging the Department of Education's revised solicitations in the near future.

Respectfully submitted,

s/ David R. Johnson

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